

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA : CASE NO. 1:25-MJ-00245
:
v. :
:
STANISLAV "STAS" GRINBERG :
:

**JOINT MOTION FOR ORDER EXTENDING TIME
PERIOD FOR FILING INDICTMENT OR INFORMATION**

The parties hereby jointly move to extend the Government's time to file an indictment or information until May 29, 2025, inclusive. In support of this Joint Motion, the parties state as follows:

1. Defendant has been charged by Complaint, dated March 19, 2025, with conspiracy to commit wire fraud and bank fraud, in violation of 18 U.S.C. § 1349, and making false statements on loan applications, in violation of 18 U.S.C. § 1014.
2. Defendant was arrested on March 20, 2025 in the Southern District of Texas and made his initial appearance in that district on the following day (*i.e.*, March 21, 2025). On March 22, 2025, the court entered an order directing that Defendant be transported to this District. Defendant is now present in the Southern District of Ohio.
3. The parties are exploring the possibility of a pre-indictment resolution of this complex financial matter, which involves allegations of multimillion-dollar fraud.
4. Accordingly, the parties agree, and respectfully submit, that the ends of justice served by granting an extension of the deadline – up to and including May 29, 2025 – outweigh the best interest of the public and Defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A). Absent the requested extension, the parties will be denied the

reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and a miscarriage of justice would result, in that the parties will have inadequate time to evaluate and investigate the current charge and to discuss, consider, and negotiate a possible pre-indictment plea. *See id.* § 3161(h)(7)(B).

5. This Joint Motion is supported by a Waiver of Timely Indictment or Information.

6. No hearing is requested on this Joint Motion.

For the foregoing reasons, the parties respectfully request that the Government's time to file an indictment or information be extended up to and including May 29, 2025.

Respectfully submitted,

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